## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

CAMRON SNEED,	§	
	§	
Plaintiff,	§	
	§	
	§	
<b>v.</b>	§	C.A. NO.: 1:19-cv-608
	§	
AUSTIN INDEPENDENT	§	
SCHOOL DISTRICT,	§	
	§	
Defendant.	§	

## AUSTIN INDEPENDENT SCHOOL DISTRICT'S PROFFER OF DEPOSITION EXCERPTS

Austin Independent School District (AISD) proffers the following excerpts from the deposition transcripts of Dr. Paul Cruz and Dr. Craig Shapiro, in rebuttal of Plaintiff's proffered deposition excerpts, and shows as follows:

- A. Deposition of Dr. Paul Cruz (taken June 26, 2020):
  - 1. Page 10, lines 22-25
  - 2. Page 11, lines 1-7
  - 3. Page 13, lines 20-23
  - 4. Page 14, lines 5-7
  - 5. Page 19, lines 8-14
  - 6. Page 20, lines 23-25
  - 7. Page 21, lines 1-10
  - 8. Page 26, lines 13-22

- 9. Page 29, lines 9-14 and 20-25
- 10. Page 30, lines 1-13
- 11. Page 31, lines 16-25
- 12. Page 32, lines 1-25
- 13. Page 33, lines 1-6 and 8-22
- 14. Page 34, lines 4-25
- 15. Page 35, lines 1-22
- 16. Page 36, lines 11-25
- 17. Page 37, lines 1-15 and 19-25
- 18. Page 38, lines 1-12 and 16-25
- 19. Page 39, lines 1-25
- 20. Page 40, lines 1-15
- B. Deposition of Dr. Craig Shapiro (taken May 18, 2020):
  - 1. Page 13, lines 18-25
  - 2. Page 14, lines 1-7 and 10-13 and 15-25
  - 3. Page 15, lines 1-2
  - 4. Page 21, lines 14-18
  - 5. Page 22, lines 2-11
  - 6. Page 42, lines 11-25
  - 7. Page 43, lines 1-3
  - 8. Page 47, lines 12-19 and 21-23
  - 9. Page 52, line 20

- 10. Page 43, lines 11-13
- 11. Page 55, lines 14-21
- 12. Page 57, line 3
- 13. Page 59, lines 4-7
- 14. Page 63, lines 4-18
- 15. Page 66, lines 15-20 and 24-25
- 16. Page 67, lines 1-5
- 17. Page 68, lines 1-3
- 18. Page 70, lines 12-20

Respectfully submitted,

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ATTORNEYS FOR AUSTIN ISD

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 4, 2020, a true and correct copy of the foregoing document was filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Martin J. Cirkiel (*Via Email:* marty@cirkielaw.com)

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Attorney for AISD